

UNITED STATES DISTRICT COURT

for the
Western District of Washington

FILED	LODGED
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Apr 27, 2020	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)SUBJECT LOCATION #1, SUBJECT LOCATION
#2, and SUBJECT VEHICLE more fully described in
Attachment A.

Case No. MJ20-5091

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. §§ 841(a)(1) and 846;
18 U.S.C. § 924(c)(1)(A)


Offense Description

Distribution, possession with intent to distribute, and conspiracy to distribute controlled substances;
Carrying or possessing a firearm in furtherance of drug trafficking

The application is based on these facts:

- ☒ See Affidavit of FBI Special Agent Benjamin Harrison, incorporated herein by reference.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.


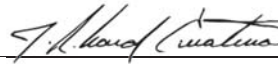
Applicant's signature

BENJAMIN HARRISON, Special Agent FBI

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 4/26/20



Judge's signature

City and state: Tacoma, Washington

J. RICHARD CREATURA, United States Magistrate Judge

Printed name and title

1 These investigations have involved the use of confidential informants, wire and physical
2 surveillances, telephone toll analysis, investigative interviews, and the service of search
3 and arrest warrants. These investigations include the unlawful importation, possession
4 with intent to distribute, and distribution of controlled substances, as well as the related
5 laundering of monetary instruments, the conducting of monetary transactions involving
6 the proceeds of specified unlawful activities, and conspiracies associated with criminal
7 narcotics offenses, in violation of federal law. As a result of my participation in these
8 investigations, I have encountered and become familiar with the various tools, methods,
9 trends, paraphernalia, and related articles used by traffickers and trafficking organizations
10 in their efforts to import, conceal, manufacture, and distribute controlled substances.

11 5. The facts set forth in this Affidavit are based on my own personal
12 knowledge; knowledge obtained from other individuals during my participation in this
13 investigation, including other law enforcement officers; review of documents and records
14 related to this investigation; communications with others who have personal knowledge
15 of the events and circumstances described herein; and information gained through my
16 training and experience. This Application is being presented by reliable electronic means
17 pursuant to Federal Rule of Criminal Procedure 41(d)(3) and Local Criminal Rule
18 41(d)(3).

19 6. Because this Affidavit is submitted for the limited purpose of establishing
20 probable cause in support of the application for search warrants, it does not set forth each
21 and every fact that I or others have learned during the course of this investigation. I have
22 set forth only the facts that I believe are necessary to establish probable cause to believe
23 that evidence, fruits and instrumentalities of violations of Title 21, United States Code,
24 Sections 841(a)(1) and 846 (distribution, possession with intent to distribute, and
25 conspiracy to manufacture or distribute controlled substances), and violations of Title 18,
26 United States Code, Sections 924(c)(1)(A) (carrying or possessing a firearm in
furtherance of drug trafficking), will be found in the apartment located at 1907 105th
Street S, #D201, Tacoma, Washington (SUBJECT LOCATION #1), the single family

home located at 1811 S 90th Street, Tacoma, Washington (SUBJECT LOCATION #2), and a blue 2006 Volkswagen Passat, VIN: WVWEK93C96P202376 (SUBJECT VEHICLE). The apartment, house, and vehicle are further described below and in Attachment A, which is attached to this Affidavit and incorporated herein by reference.

IDENTIFICATION OF THE ITEMS TO BE SEARCHED

7. This Affidavit is submitted in support of an application for a warrant to search the apartment identified herein as SUBJECT LOCATION #1, the single family home identified as SUBJECT LOCATION #2, and the Volkswagen Passat identified as SUBJECT VEHICLE, as further described below and in Attachment A, for evidence, fruits, and instrumentalities, as further described in Attachment B, of violations of the Title 21 and Title 18 above-described crimes committed by JALEN EARL MOOREHEAD:

a. SUBJECT LOCATION #1: The apartment located at 1907 105th Street S, #D201, Tacoma, Washington. The apartment is within a complex known as the Heatherstone Apartments. Building D is a three story building which is two-tone blue in color with white trim. Apartment 201 of Building D is located on the second floor, on the West end of the building. The door of Apartment 201 is blue in color and has the number "201" in white on it.

b. SUBJECT LOCATION #2: The single family home located at 1811 S 90th Street, Tacoma, Washington. The house is a two story building which is light blue in color with white trim. The front door is white and faces south. The number "1811" is in black to the right of the front door.

c. SUBJECT VEHICLE: A blue 2006 Volkswagen Passat, VIN: WVWEK93C96P202376, bearing Washington license plate BSA2916, which is registered to Taneisha Marie Enick.

THE INVESTIGATION

February 9, 2019 Arrest

8. On February 9, 2019, at approximately 12:11 a.m., an Auburn Police Department (APD) unit was in the City of Auburn, Washington, when a black, 2018 Nissan Altima (bearing Oregon license plate 088KRY) was observed traveling without

1 working tail lamps during overnight hours. APD initiated a traffic stop and contacted the
2 driver, later identified as JALEN MOOREHEAD. When first questioned,
3 MOOREHEAD stated he did not have identification with him and provided the name of
4 his brother, Jaquan Moorehead. The APD officer smelled the distinct odor of marijuana,
5 and requested another officer respond to their location to assist with the administration of
6 field sobriety tests. The vehicle was determined to belong to Enterprise Rental.

7 9. While researching the name Jaquan Moorehead, APD determined
8 MOOREHEAD had provided a false name. When confronted, MOOREHEAD continued
9 to lie and began exhibiting pre-flight behaviors, such as looking around for avenues of
10 escape. After being placed into handcuffs, he confessed that his true name was JALEN
11 MOOREHEAD, and he lied because he knew he had an active arrest warrant. APD
12 confirmed MOOREHEAD had active warrants for Driving While License Suspended,
13 and Hit and Run of an Attended Vehicle. In a search of MOOREHEAD's person
14 incident to arrest, he was found to have a significant amount of cash in his pockets.

15 10. APD observed a significant amount of cash in plain view near the vehicle's
16 center console, which was later determined to be \$12,851. MOOREHEAD explained
17 that the cash was from a recent settlement after a motor vehicle collision. At some point
18 during the traffic stop, MOOREHEAD's girlfriend, Tanika Tsow, arrived on scene and
19 requested to retrieve some of her personal property from the vehicle. As APD was
20 assisting Tsow with the retrieval of some of her clothing from the backseat, they
21 observed a significant amount of cash in an interior pocket of the driver's door.
22 Consistent with APD policy, they started an inventory of the vehicle because it was going
23 to be towed. During the inventory, APD discovered a ziplock bag in the center console
24 containing what appeared to be heroin. After discovering the bag of apparent heroin,
25 APD stopped the inventory and sealed the vehicle, pending application of a search
26 warrant.

11. A State search warrant for the Altima was obtained by APD and executed
later on February 9, 2019. APD located cash in several locations in the vehicle: \$4,771 in
HARRISON AFFIDAVIT/USAO # 2020R00016

1 the glove compartment, \$908 in the center console, \$700 in the trunk, and \$1006 in the
2 interior pocket of the driver's door. Under the driver's seat were four bags of pills: one
3 bag contained 25 green tablets, one bag contained 42 brown tablets, the third bag
4 contained 214 blue tablets, and the fourth bag contained 340 brown and blue tablets. The
5 four bags contained a total of 621 pills which field-tested positive for MDMA (ecstasy),
6 but which were later determined by the Washington State Patrol Crime Laboratory to
7 contain methamphetamine. Near the pills under the driver's seat was a Glock 27 .40
8 caliber semi-automatic pistol, bearing serial number VDE774, which had an inserted
9 magazine containing 16 live rounds and one live round in the chamber. In an interior
10 pocket of the driver's door, APD located a bag containing 20.2 grams of suspected
11 cocaine, and a bag containing 25.5 grams of suspected heroin. On the front passenger's
12 seat was a bag containing 7.3 grams of suspected heroin, which had initially been found
13 in the center console during the inventory. The cocaine and heroin both field-tested
14 positive. APD seized a total of \$20,236 from the vehicle, not including the amount found
15 on MOOREHEAD's person at arrest. Narcotics packaging items such as clear and multi-
16 colored ziplock bags were also seized from the vehicle.

17 **June 6, 2019 Arrest**

18 12. On June 6, 2019, at approximately 1:50 p.m., a Pierce County Sheriff's
19 Department (PCSD) unit was conducting a burglary investigation in the vicinity of the
20 8700 block of Hosmer Street in Tacoma, Washington. In the parking lot of the
21 Econolodge, 8820 Hosmer Street, they observed a black, 2010 BMW 750LI (bearing
22 Washington State license plate BMZ9457). PCSD performed a database query of the
23 BMW's license plate and learned that there was a failure to transfer the title within 45
24 days, which was a violation of Washington State law. When PCSD initiated a traffic
25 stop, the BMW immediately parked and a male later identified as JALEN
26 MOOREHEAD exited the driver's seat. PCSD deputies requested MOOREHEAD get
back into the car, but he refused and instead looked around the area nervously. As PCSD
deputies approached the BMW, they observed, from outside the car, a black, semi-

1 automatic pistol in plain view on the driver's seat. MOOREHEAD was then handcuffed
2 for safety reasons. MOOREHEAD initially told deputies his name was Jacob E.
3 Morrison. PCSD performed a database query of the name, but could not locate a record
4 or driver's status which matched, so MOOREHEAD was placed under arrest for
5 Obstructing/Providing a False Statement, which is a violation of Washington State law.

6 13. During a search of MOOREHEAD's person incident to arrest, PCSD
7 located a sandwich bag containing 734 blue pills which they identified as Oxycodone
8 Hydrochloride 30 milligrams, and \$4,176 in varying denominations of cash.
9 MOOREHEAD stated the pills were "like Adderall," and he did not require the pills for a
10 medical condition. He advised PCSD the cash was from a settlement he won related to a
11 collision. He further stated he found the firearm in the vehicle's glovebox and that it was
12 not his.

13 14. PCSD confirmed MOOREHEAD's identity and that he was classified as a
14 convicted felon, with his most recent convictions for Residential Burglary and Possession
15 of a Controlled Substance.¹ MOOREHEAD was booked into Pierce County Jail for Felon
16 in Possession of a Firearm, Possession of Narcotics with Intent to Distribute, Obstruction,
17 and Failure to Transfer Title Within 45 Days. While being booked, deputies located an
18 additional \$230 in varying denominations of cash, inside his shorts, which were under his
19 sweats. The BMW was sealed and towed to a secure PCSD lot pending a search warrant.

20 15. A search warrant for the BMW obtained by PCSD was executed on June 7,
21 2019. On the front passenger seat was a gray and pink duffel bag. Inside the main
22 compartment of the duffel bag was a bag of blue pills (weighing approximately 247
23 grams), a bag of green pills (approximately 244 grams), \$175, and an orange grocery bag.
24 Inside the grocery bag was \$26,105 in varying denominations of cash and coin. In an
25 outer pocket of the gray and pink duffel bag was a bag of yellow pills (approximately 249
26 grams), and a bag of green pills (approximately 269 grams). In the glovebox of the

¹ These appear to be juvenile adjudications for felonies.
HARRISON AFFIDAVIT/USAO # 2020R00016

1 BMW was a prescription bottle for “Carlos Shaw” for Hydrochlorothiazide² (24 of
2 25mg), and an invoice for the BMW with MOOREHEAD’s name on it. In the back
3 pocket of the front passenger’s seat were medical documents with MOOREHEAD’s
4 name on them, and a digital scale. On the driver’s seat was a Glock 45, 9mm semi-
5 automatic pistol, serial number BKDM969, containing 16 live rounds in the magazine
6 and one live round in the chamber. This pistol was later confirmed to be stolen. In a
7 pocket inside the driver’s door was \$692 in varying denominations of cash and coin.

8 16. Subsequent testing by a Forensic Scientist at the Washington State Patrol
9 Crime Laboratory determined that a sampling of pills from each group of pills above
10 (aggregate total of approximately 3,802 pills) contained methamphetamine.

11 **October 29, 2019 Incident (not charged)**

12 17. On October 29, 2019, at approximately 2:30 p.m., a Washington State
13 Patrol (WSP) unit was conducting routine patrol on Northbound Interstate 5 near Lacey,
14 Washington, when a silver Nissan Altima was observed traveling approximately 72 mph
15 in a 60 mph zone. WSP initiated a traffic stop, and the vehicle pulled over near milepost
16 106. When the WSP Trooper contacted the driver, he smelled marijuana and observed an
17 open red cup in plain view in the vehicle which contained a substance which appeared to
18 be marijuana. The Trooper advised the driver, later identified as JALEN
19 MOOREHEAD, that the marijuana needed to be stored in a secure manner while driving.
20 The Trooper suggested securing the marijuana in the trunk of the vehicle, to which
21 MOOREHEAD agreed.

22 18. When MOOREHEAD exited the vehicle, and while attempting to open the
23 trunk lid, the Trooper noted that MOOREHEAD was acting in an extremely nervous
24 manner, and apologizing repeatedly. When MOOREHEAD voluntarily opened the trunk,
25 the Trooper observed a backpack underneath a coat. When the Trooper asked
26 MOOREHEAD what was in the backpack, MOOREHEAD hesitantly opened it to reveal

² According to WebMD.com, this is a diuretic that is used to treat high blood pressure.
HARRISON AFFIDAVIT/USAO # 2020R00016

1 a red shoe box. The Trooper suggested securing the marijuana in the shoe box, but
2 MOOREHEAD indicated he would rather just throw the marijuana away.
3 MOOREHEAD continued acting nervous, and stated there were shoes in the shoe box.
4 MOOREHEAD briefly opened the shoe box and before he closed it, the Trooper
5 observed 5 or 6 plastic bags inside. The Trooper asked exactly what was in the shoe box,
6 but MOOREHEAD refused to answer. Believing the plastic bags contained contraband,
7 the Trooper attempted to secure the shoe box and open the lid. MOOREHEAD
8 immediately grabbed the contents of the box and fled on foot, north along the shoulder of
9 the road. The Trooper gave verbal commands for MOOREHEAD to stop, but he
10 continued to flee. The Trooper observed MOOREHEAD drop some of the contents of
11 the box, stop to retrieve a portion of them, and then jump over a fence before getting
12 away on foot.

13 19. When additional WSP units arrived, MOOREHEAD's path of flight was
14 followed, and a tinfoil-wrapped square was found near the fence line. A tear in the foil
15 revealed a chalky white powder block inside. When later weighed, this tinfoil-wrapped
16 block of white powder was found to weigh 186 grams. WSP also noted open marijuana
17 in the passenger compartment of the Altima, and packaging material inside the shoe box
18 which came out of the backpack in the trunk. The Altima was towed to a secure lot,
19 pending a search warrant.

20 20. A search warrant for the Altima was obtained by WSP on October 31,
21 2019. In the center console was a prescription bottle with liquid Codeine, a prescription
22 bottle for Oxycodone Acetaminophen with two pills in it, and a credit or debit card in the
23 name of Jalen Moorehead. Underneath the driver's side back seat was a digital scale.
24 Inside the trunk was a blue backpack, which contained a digital scale with white powder
25 residue on it, and \$489 in varying denominations of cash. Also in the trunk was a red
26 coat. In a pocket of the coat were 28 pills with "M30" markings, which is consistent with
Oxycodone Hydrochloride.

Subject Location #1

21. A review of open source databases identified 1907 105th Street S, Tacoma, Washington, as the most recent address for MOOREHEAD. MOOREHEAD has been associated with the location since November 18, 2019. The address corresponds with Building D of the Heatherstone Apartments, located at 1809 105th Street Court, South, Tacoma, Washington. No unit number is provided in the open source record associated with MOOREHEAD.

Surveillance of JALEN MOOREHEAD

22. On December 31, 2019, MOOREHEAD was observed in the Walmart located at 1965 S Union Avenue, Tacoma, Washington, with an unknown female. MOOREHEAD exited the Walmart and was observed entering the driver's seat of the black, 2001 Mercedes 430 sedan bearing Washington State license plate 198ZJA. The unknown female entered the front passenger's seat of the vehicle. MOOREHEAD drove out of the Walmart parking lot and surveillance was terminated.

23. An initial records check indicated the registered owner of the Mercedes was Moises and Rowena Villanueva. Later records checks indicated the title for the Mercedes was transferred to MOOREHEAD on January 28, 2020.

24. On January 16, 2020, MOOREHEAD was observed sitting in the driver's seat of the Mercedes, while it was parked in the lot of the Heatherstone Apartments. After approximately 50 minutes, MOOREHEAD exited the vehicle and walked into the western most stairwell of Building D. Building D also has its own address of 1907 105th Street S, Tacoma, Washington.

25. On January 23, 2020, the Mercedes was observed pulling into the Heatherstone Apartments. Surveillance was unable to identify any occupants of the vehicle, and it parked in a location which was not visible to surveillance. Less than 30 seconds after losing sight of the Mercedes, MOOREHEAD and an unknown male were observed on the sidewalk as they walked into the western most stairwell of Building D. Surveillance moved to the north of the building and maintained a visual on the back side

1 of Building D, where the second-story light on the northwest side of the building turned
2 on moments later. A placard located on the front of the building identified the second-
3 story, western most apartment, as Unit 201. The Mercedes was found parked in the area
4 from which MOOREHEAD and the unknown male were walking away from when
5 observed entering the stairwell of Building D.

6 26. On March 11, 2020, Superior Court Judge Grant Blinn in Pierce County,
7 Washington signed an Order for Pen Register/Trap and Trace, and location information
8 for a cellular phone believed to be used by MOOREHEAD. The Order authorized the
9 FBI and Pierce County Sheriff's Department to obtain the specified information from
10 March 11, 2020 through May 9, 2020.

11 27. Physical surveillance by the SSGTF and FBI, some of which is described
12 below, verified the location of the cellular phone being tracked was consistent with the
13 movements of MOOREHEAD and no other individuals.

14 28. On March 23, 2020, MOOREHEAD was observed exiting SUBJECT
15 LOCATION #1 with three other males. MOOREHEAD had a ring of keys in his hand as
16 he approached the blue Volkswagen Passat bearing Washington license plate BSA2916
17 (SUBJECT VEHICLE), which was parked, unoccupied, in the lot of the Heatherstone
18 Apartments. MOOREHEAD accessed the front passenger's door of the vehicle, leaned
19 inside for a few seconds, and then closed the door and walked away. He entered the front
20 passenger's seat of a separate vehicle driven by one of the males he exited SUBJECT
21 LOCATION #1 with, and they departed the parking lot.

22 29. A records check indicated the registered owner of the SUBJECT VEHICLE
23 was Taneisha Marie Enick. An additional records check indicated Enick had address
24 history at 1811 S 90th Street, Tacoma, Washington (SUBJECT LOCATION #2).

25 30. On March 24, 2020, the SUBJECT VEHICLE was observed parked,
26 unoccupied, outside SUBJECT LOCATION #2. Members of the SSGTF conducted
physical surveillance of the residence and observed multiple "short stay" visitors:

- 1 • 1:00 p.m. – white Jeep Wrangler (bearing Washington license plate BIP4753)
2 parked in front of residence. An adult female exited the Jeep, knocked on the
3 front door of the house, and was let inside after a short wait. The same female
4 exited the residence approximately 14 minutes later and departed in the Jeep.
- 5 • 1:45 p.m. – white Chrysler Town and Country minivan (bearing Washington
6 license plate 608ZIG) parked in front of residence. A white male, later identified
7 as Jeffrey L. Johnson, the registered owner of the minivan, exited the front
8 passenger's seat, knocked on the front door of house, and was let inside after a
9 short wait. Johnson exited the residence approximately seven minutes later and
10 departed in the minivan. Johnson has two separate, previous Washington State
11 felony convictions for Unlawful Delivery of a Controlled Substance. In both
12 cases, Johnson had significant amounts of Oxycodone.
- 13 • 1:54 p.m. – white Toyota Camry (bearing Washington license plate AIE3079)
14 parked in front of residence. MOOREHEAD exited SUBJECT LOCATION #2
15 and entered the Camry. The vehicle drove approximately two blocks away, then
16 returned to the residence. MOOREHEAD exited the Camry and let himself back
17 into SUBJECT LOCATION #2. The Camry departed the area.

18 31. Minutes after the last of the above short stays, a female exited SUBJECT
19 LOCATION #2 and entered the front passenger's seat of the SUBJECT VEHICLE.
20 MOOREHEAD exited the residence shortly after her, and entered the driver's seat.
21 MOOREHEAD drove the two to Tacoma General Hospital, 315 MLK Jr Way, Tacoma,
22 Washington. The vehicle pulled into a recessed, valet or drop-off area, and surveillance
23 terminated.

24 32. On March 25, 2020, the SSGTF conducted additional physical surveillance
25 at SUBJECT LOCATION #2. At approximately 3:30 p.m., MOOREHEAD and the same
26 female from the previous day exited the residence. The female was dressed in a scrubs
uniform. The female entered the front passenger's seat and MOOREHEAD entered the
driver's seat of the SUBJECT VEHICLE. MOOREHEAD again drove the two to
Tacoma General Hospital, 315 MLK Jr Way, Tacoma, Washington. After pulling in
briefly to the same recessed parking area as the day before, MOOREHEAD was observed
driving the SUBJECT VEHICLE away from the hospital, alone.

1 33. After leaving the hospital, MOOREHEAD drove to Discount Auto Sales
2 and Service Center, 12001 Pacific Highway SW, Lakewood, Washington. Employees of
3 the business appeared to service the vehicle while MOOREHEAD walked and danced
4 around the parking lot for approximately one hour. While under observation in the
5 parking lot, MOOREHEAD was holding a dark blue backpack with a yellow zipper or
6 yellow stitching around the zipper, and an outer pocket which was red.

7 34. When MOOREHEAD left Discount Auto Sales and Service Center, he
8 drove to the parking lot of SUBJECT LOCATION #1. Upon arriving at the Heatherstone
9 Apartments, he remained sitting in the SUBJECT VEHICLE. After a few minutes,
10 Raymone Leblanc drove into the parking lot in the black Chrysler 300 (bearing
11 Washington license plate BOB1835). Upon parking, Leblanc exited the driver's seat of
12 the Chrysler and entered the front passenger's seat of the SUBJECT VEHICLE. After
13 approximately five minutes in the SUBJECT VEHICLE, both MOOREHEAD and
14 Leblanc exited the vehicle and walked into the stairwell leading to SUBJECT
LOCATION #1.

15 35. Leblanc is a known associate of MOOREHEAD, and has a criminal history
16 including illegal firearms and narcotics. On February 25, 2020, the SSGTF arrested
17 Leblanc from the Chrysler, at which time he had a plastic bag of more than 70 pills which
18 were marked as Oxycodone 30s. At the time of the meeting between Leblanc and
19 MOOREHEAD described in the previous paragraph, Leblanc had three pending narcotics
20 cases in Pierce County Superior Court.

21 36. On April 7, 2020, the SUBJECT VEHICLE was observed unoccupied,
22 parked outside SUBJECT LOCATION #2. Location data from the cellular phone
23 believed to be used by MOOREHEAD indicated the device was in, or near, SUBJECT
LOCATION #2.

24 37. Also on April 7, 2020, the Mercedes was observed unoccupied, parked
25 outside SUBJECT LOCATION #1. The vehicle appeared to have a flat tire, and several
26 of the windows were broken. The Mercedes was last observed on April 13, 2020, parked

1 in the same location as on April 7th, and still having a flat tire and broken windows. The
2 Mercedes was subsequently towed away after the apartment complex had posted a notice
3 of intent to tow on its driver's door window.

4 38. An analysis of location information for the cellular phone believed to be
5 used by MOOREHEAD indicated the device spends the majority of time split between
6 SUBJECT LOCATIONS #1 and #2. An overview of the device's location from April 12,
7 2020 through mid-day on April 20, 2020, is consistent with physical surveillance
8 observations which indicate MOOREHEAD is often at SUBJECT LOCATION #1 during
9 the afternoon hours until late at night or early the next morning, and at SUBJECT
10 LOCATION #2 from late at night or early in the morning until afternoon hours.

11 39. The analysis of location information for the cellular phone also indicated
12 the device made two short trips to Yakima, Washington during the collection period. On
13 March 28, 2020, the device was in Yakima for just under four hours, from approximately
14 5:30 p.m. until approximately 9:15 p.m. On the return trip, the device appeared to pause
15 for approximately 30 minutes in Federal Way, Washington before continuing south to
16 SUBJECT LOCATION #1. On April 14, 2020, the device was in the Yakima area for
17 approximately four hours, from approximately 4:30 p.m. until approximately 8:30 p.m.
18 The device appeared to travel directly to SUBJECT LOCATION #1 upon returning from
19 Yakima.

20 40. On April 15, 2020, at approximately 2:11 p.m., MOOREHEAD and a
21 female in a scrubs uniform were observed exiting SUBJECT LOCATION #2. The
22 female got into the driver's seat of the SUBJECT VEHICLE, and MOOREHEAD got
23 into the front passenger's seat. The two drove southbound away from SUBJECT
24 LOCATION #2, in the direction of SUBJECT LOCATION #1. Approximately 13
25 minutes after departing SUBJECT LOCATION #2, the SUBJECT VEHICLE was
26 observed departing the area of SUBJECT LOCATION #1. The vehicle appeared to be
observed solely by the female driver. At approximately 2:30 p.m., MOOREHEAD was
observed walking out of the stairwell which leads to SUBJECT LOCATION #1. He

1 entered the front passenger door of a parked Honda Accord, bearing Washington license
2 plate BRD5354. After being inside the Honda for approximately seven minutes,
3 MOOREHEAD exited and returned to the stairwell leading to SUBJECT LOCATION
4 #1. The Honda, occupied only by the driver, then departed the Heatherstone Apartments
5 parking lot.

6 41. On April 17, 2020, the United States Postal Inspection Service (USPIS)
7 provided information indicating recipients of mail to SUBJECT LOCATION #1 included
8 the last name, "Moorhead," among others.

9 42. Also on April 17, 2020, the USPIS provided further information indicating
10 recipients of mail to SUBJECT LOCATION #2 included the last name, "Enick," among
11 others.

12 43. On April 24, 2020, the device believed to be used by MOOREHEAD again
13 travelled to the Yakima, Washington area. Phone pings showed the device had departed
14 Yakima after being there for approximately two and one-half hours, and was heading
15 westbound on Interstate-90.

16 44. On April 24, 2020, at approximately 6:27 p.m., a black Chevrolet Malibu
17 bearing Washington license plate BNA1807 was observed driving by SUBJECT
18 LOCATION #2 at an extremely slow rate of speed, and then departing the area. There
19 were several people milling around the driveway of the house, and the SUBJECT
20 VEHICLE was not present. It is suspected that one or both of those two facts caused the
21 Malibu to depart the area. At approximately 6:33 p.m., the same Malibu entered the
22 parking lot of the Heatherstone Apartments. JALEN MOOREHEAD was identified as
23 the driver of the vehicle, and was the sole occupant. The location information for the
24 device believed to be used by MOOREHEAD also appeared in the same area at the same
25 time, after traveling back from Yakima. The registered owners of the Malibu are
26 Tazanique Virgil and Cedric Silas. The vehicle MOOREHEAD was driving when he
was stopped by WSP on October 29, 2019 and subsequently fled on foot, was an
Enterprise Rental vehicle which was rented to Tazanique Virgil at the time of the stop.

1 45. After sitting alone in the Malibu for approximately 25 minutes,
2 MOOREHEAD, wearing a black Adidas brand hooded sweatshirt and black sweatpants
3 with red stripes up the legs, walked into SUBJECT LOCATION #1 carrying two bags.
4 Both bags in his hands appeared to be reusable shopping bags. One of the bags was black
5 with the GNC logo on it, and the other bag was red. At approximately 7:06 p.m.,
6 MOOREHEAD exited SUBJECT LOCATION #1 with nothing in his hands. He walked
7 out of sight towards the northeast corner of the apartment complex, away from both
8 SUBJECT LOCATION #1 and the Malibu. After being out of sight for approximately
9 three minutes, he was observed walking back into SUBJECT LOCATION #1. In one
10 hand he carried a disposable cup. At approximately 7:11 p.m., MOOREHEAD walked
11 out of SUBJECT LOCATION #1 with only a cell phone in his hand. He again walked
12 out of sight towards the northeast corner of the apartment complex. After being out of
13 sight for approximately 10 minutes, he was observed walking back into SUBJECT
14 LOCATION #1. At approximately 7:23 p.m., a light colored Chevrolet Camaro, bearing
15 Washington license plate BSL3813, pulled up in front of Building D. An unknown male
16 exited the front passenger seat of the Camaro and walked into SUBJECT LOCATION
17 #1. The Camaro drove one lap around the apartment complex, and then departed.
18 Approximately nine minutes after leaving, the Camaro returned and again pulled up in
19 front of Building D. Approximately three minutes after returning, the same unknown
20 male who previously exited the Camaro walked out of SUBJECT LOCATION #1 with
21 an unknown item in his hand. He entered the front passenger seat of the Camaro for less
22 than one minute, and then exited with empty hands. He returned to SUBJECT
23 LOCATION #1, alone. The Camaro then departed the area, occupied only by the driver.

24 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

25 46. Based upon my training and experience, and conversations with other
26 experienced law enforcement agents and officers who have been involved in narcotics
and firearms cases, I know the following:

1 47. “Short stays” is a term used to describe a high rate of non-resident travel
2 into and out of a location, for short durations of time, which is commonly observed at
3 places where narcotics are being sold.

4 48. The distribution of illegal narcotics is frequently a continuing activity
5 lasting over months and years. Persons involved in the trafficking of illegal controlled
6 substances typically will obtain and distribute controlled substances on a regular basis,
7 much as a distributor of a legal commodity would purchase stock for sale. Similarly,
8 such drug traffickers will maintain an “inventory” which will fluctuate in size depending
9 upon the demand for and the available supply of the product. Drug traffickers often keep
10 records of their illegal activities not only during the period of their drug trafficking
11 violations, but also for a period of time extending beyond the time during which the
12 trafficker actually possesses/controls illegal controlled substances. The records are kept
13 in order to maintain contact with criminal associates for future transactions and so that
14 the trafficker can have records of prior transactions for which the trafficker might still be
15 owed money or might owe someone else money. Dealers often keep these records in
16 their homes and in vehicles that they own, use, or have access to.

17 49. It is common for drug dealers to conceal large quantities of currency,
18 foreign currency, financial instruments, precious metals, jewelry, and other items of value
19 which are proceeds from drug trafficking in their residences and in other storage areas
20 associated with the residence, such as on-site storage lockers, garages, detached storage
21 sheds, and parking stalls, or safes located on the property.

22 50. Evidence of excessive wealth beyond an individual’s outward means is
23 probative evidence of the distribution of controlled substances. Therefore, receipts
24 showing the expenditure of large sums of money and/or the expensive assets are evidence
25 of drug trafficking. Drug traffickers commonly keep the expensive assets themselves
26 and/or documentation of the purchase of the asset (receipts, warranty cards, etc.) in their
homes, places of business, and in vehicles that they own, use, or have access to.

 51. It is common for drug dealers to maintain equipment and supplies (i.e.,

1 scales, packaging, masking agents) on hand over a lengthy period of time, even when
2 they do not have any controlled substances on hand. The aforementioned items are
3 frequently maintained in the dealer's homes, places of business, stash houses or storage
4 units, and in vehicles that they own, use, or have access to.

5 52. Drug dealers often have some amount of inventory – namely, illegal drugs
6 – stored in their homes, places of business, stash houses or storage units, and in vehicles
7 that they own, use, or have access to.

8 53. It is common for drug dealers to possess firearms and ammunition to
9 protect their drugs, assets, and persons from hostile gangs, rival traffickers, other
10 criminals, and from law enforcement. Persons who purchase and possess firearms also
11 tend to maintain the firearms and ammunition for lengthy periods of time. Firearms can
12 be acquired both legally and unlawfully, without official/traceable documentation.
13 Persons who acquire firearms from Federal Firearms Licensees, through deliberate fraud
14 and concealment, often will also acquire firearms from private parties and other sources
15 unknown to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Persons
16 who, whether legally or illegally, purchase, possess, sell and/or transfer firearms or
17 ammunition commonly maintain the firearms or ammunition on their person, at their
18 residence or business, or in a motor vehicle which they own and/or operate. Firearms or
19 ammunition are often secreted at other locations within their residential curtilage, and the
20 identification of these firearms will assist in establishing their origin. Persons who
21 purchase, possess, sell and/or trade firearms or ammunition commonly maintain
22 documents and items that are related to the purchase, ownership, possession, sale and/or
23 transfer of firearms, ammunition, and/or firearm parts, including but not limited to
24 driver's licenses, telephone records, telephone bills, address and telephone books,
25 canceled checks, receipts, bank records and other financial documentation on the owner's
26 person, at the owner's residence or business, or in vehicles that they own, use, or have
access to. Additionally, these individuals often maintain holsters, spare magazines or
speed loaders and other instruments to facilitate the use of firearms in furtherance of

1 criminal activity or acts of violence.

2 54. It is common for members of drug trafficking organizations, in an attempt
3 to disguise their identities and illegal activities, to use prepaid cellular telephones and
4 prepaid long-distance calling cards. Often the only way to connect a subject with a
5 particular prepaid cellular telephone or calling card is to seize the phone or calling card
6 from the trafficker, his residence, or his vehicle. The aforementioned items are
7 frequently maintained in the drug trafficker's residence, place of business, vehicle, or
8 other areas they have access to.

9 55. Drug dealers often carry many of the items described above – including
10 (but not limited to) drugs, drug proceeds, firearms, cellular phones – on their person.

11 56. Based upon this and other evidence, I believe there is probable cause to
12 believe that evidence, fruits and instrumentalities of violations of Title 21, United States
13 Code, Sections 841(a)(1) and 846, and of Title 18, United States Code, Section
14 924(c)(1)(A) will be found in the SUBJECT LOCATIONS 1 and 2, and in the SUBJECT
15 VEHICLE.

16 CONCLUSION

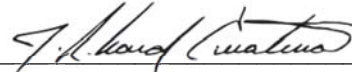
17 57. I submit that this Affidavit supports probable cause for a search warrant
18 authorizing the search of the apartment located at 1907 105th Street S, #D201, Tacoma,
19 Washington (SUBJECT LOCATION #1) the single family home located at 1811 S 90th
20 Street, Tacoma, Washington (SUBJECT LOCATION #2), and, the blue 2006
21 Volkswagen Passat, VIN: WVWEK93C96P202376 (SUBJECT VEHICLE), as described
22 herein and in Attachment A, for evidence and/or fruits of the commission of the crimes
23 codified at Title 21, United States Code, Sections 841(a)(1) and 846 (distribution,
24 possession with intent to distribute, and conspiracy to manufacture or distribute
25 controlled substances), and Title 18, United States Code, Section 924(c)(1)(A) (carrying
26

1 or possessing a firearm in furtherance of drug trafficking), as set forth in Attachment B.
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5 _____
6 BENJAMIN HARRISON, Affiant
7 Special Agent
8 Federal Bureau of Investigation

9 The above-named agent provided a sworn statement attesting to the truth of the
10 foregoing affidavit on the 26th day of April, 2020.
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13 _____
14 J. RICHARD CREATURA
15 United States Magistrate Judge
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ATTACHMENT A
ITEMS TO BE SEARCHED

The property to be searched is:

- a. SUBJECT LOCATION #1: The apartment located at 1907 105th Street S, #D201, Tacoma, Washington. The apartment is within a complex known as the Heatherstone Apartments. Building D is a three story building which is two-tone blue in color with white trim. Apartment 201 of Building D is located on the second floor, on the West end of the building. The door of Apartment 201 is blue in color and has the number “201” in white on it;
- b. SUBJECT LOCATION #2: The single family home located at 1811 S 90th Street, Tacoma, Washington. The house is a two story building which is light blue in color with white trim. The front door is white and faces south. The number “1811” is in black to the right of the front door.
- c. SUBJECT VEHICLE: A blue 2006 Volkswagen Passat, VIN: WVWEK93C96P202376, bearing Washington license plate BSA2916, which is registered to Taneisha Marie Enick.

ATTACHMENT B

The items to be seized are the following, which constitute evidence of criminal activity consisting of the crimes codified at Title 21, United States Code, Sections 841(a)(1) and 846 (distribution, possession with intent to distribute, and conspiracy to manufacture or distribute controlled substances), and Title 18, United States Code, Section 924(c)(1)(A) (carrying or possessing a firearm in furtherance of drug trafficking).

- a. Controlled Substances, including but not limited to, methamphetamine, heroin, cocaine, marijuana, MDMA (ecstasy) and prescription narcotics.
- b. Any containers and packaging materials used to process, store, conceal and package and repackage those controlled substances, including scales, vacuum sealers, bags and baggies, plastic wrap, cardboard containers and other containers used to process, store, conceal and package and repackage controlled substances.
- c. Written records and documents concerning illegal drug distribution including: coded, cryptic, or plain text pay and owe records pertaining to sales of controlled substances, amounts due, amounts collected, or amounts paid for the illegal drugs, or their packaging and distribution.
- d. Personal and business books and papers reflecting names, addresses, telephone numbers, and other contact or identification data relating to the illegal distribution of controlled substances.
- e. Photographs or video movies of Jalen Moorehead, his co-conspirators, and the property and assets purchased with drug proceeds.
- f. Written business documents, ledgers, address books, telephone toll records, notes, messages, photographs, and video films, and encrypted memoranda indicating drug sales, debts, and criminal affiliates; wire transfer records, money orders, and cashier's checks; bank account records, including safe deposit box records and keys, checking and savings.
- g. Drug proceeds and evidence of proceeds including: United States currency, jewelry, money orders, and cashier's checks.
- h. Firearms and other various components related to firearms, such as ammunition, magazines and other ammunition storage devices, cleaning kits, spare parts for firearms, holsters, bullets, shell casings, primers, powders, reloading equipment, firearm boxes/cases, targets used for practice, lockboxes, trigger locks, scopes, laser sights and other gun-related optics, receipts, memoranda and/or notes pertaining to the acquisition, receipt, purchase, repair or disposition of firearms, books, diagrams, manuals, photographs (in print or on digital media), undeveloped film and videos, and gun safes.

- i. Any locked or closed containers believed to contain any of the above listed evidence.
- j. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, rental records or payment receipts, leases, mortgage statements, and other documents.
- k. Evidence of storage unit rental or access.
- l. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.
- m. Cellular telephones, tablets, and other communications devices.